

UNITED STATES OF AMERICA,) No.
)
 Plaintiff,) COUNT 1:
) Sexual Exploitation of a Child –
 vs.) Production Of Child Pornography
)
 JASON JAYAVARMAN,) Vio. of 18 U.S.C. §§ 2251(a)
) and (e)
 Defendant.)
)
)
)
)
)

) COUNT 2:
) Sexual Exploitation of Child—
) Transportation of Child
) Pornography
)
) Vio. of 18 U.S.C.
) §§ 2252A(a)(1) and (b)(1)
)
)
) COUNT 3:
) Sexual Exploitation of Child—
) Possession of Child Pornography
)
) Vio. of 18 U.S.C.
) §§ 2252A(a)(5)(B) and (b)(2)
)
) COUNT 4:
) Engaging in Illicit Sexual Conduct
) in Foreign Places
)
) Vio. of 18 U.S.C. § 2423(c)
)
) COUNT 5:
) Travel with Intent to Engage in
) Illicit Sexual Conduct
)
) Vio. of 18 U.S.C. § 2423(b)
)
) COUNT 6:
) Travel with Intent to Engage in
) Illicit Sexual Conduct
)
) Vio. of 18 U.S.C. §§ 2423(b)
) and (e)
)

INDICTMENT

The Grand Jury charges that:

COUNT 1
**Sexual Exploitation of a Child –
Production of Child Pornography**

Beginning at a time unknown, but sometime between on or about April 7, 2010, and on or about August 14, 2013, in the District of Alaska and elsewhere, the Defendant, JASON JAYAVARMAN, did employ, use, persuade, induce, entice, and coerce a minor child to take part in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that visual depiction was thereafter transported in and affecting interstate and foreign commerce.

All of which is in violation of 18 U.S.C. §§ 2251(a) and (e).

COUNT 2
**Sexual Exploitation of a Child –
Transportation of Child Pornography**

Beginning at a time unknown, but sometime between on or about April 7, 2010, and on or about August 14, 2013, in the District of Alaska and elsewhere, the Defendant, JASON JAYAVARMAN, did knowingly transport images of child pornography in interstate and foreign commerce by any means including by computer.

All of which is in violation of 18 U.S.C. §§ 2252A(a)(1) and (b)(1).

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COUNT 3
**Sexual Exploitation of a Child –
Possession of Child Pornography**

Beginning at a time unknown, but sometime between on or about April 7, 2010, and on or about August 14, 2013, in the District of Alaska and elsewhere, the Defendant, JASON JAYAVARMAN, did knowingly possess any material that contains an image of child pornography that has been transported in and affecting interstate and foreign commerce by any means including by computer.

All of which is in violation of 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2).

COUNT 4
**Engaging in Illicit Sexual Conduct
in Foreign Places**

Beginning at a time unknown, but sometime between on or about December 15, 2009, and on or about April 17, 2013, in the District of Alaska and elsewhere, the Defendant, JASON JAYAVARMAN, a United States citizen, did travel in foreign commerce and engage in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with another person.

All of which is in violation of 18 U.S.C. § 2423(c).

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COUNT 5
Travel with Intent to
Engage in Illicit Sexual Conduct

Beginning at a time unknown, but sometime between on or about March 20, 2011, and on or about December 6, 2011, in the District of Alaska and elsewhere, the Defendant, JASON JAYAVARMAN, a United States citizen, did intentionally travel in foreign commerce for the purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with another person.

All of which is in violation of 18 U.S.C. § 2423(b).

COUNT 6
Travel with Intent to
Engage in Illicit Sexual Conduct

Beginning at a time unknown, but sometime between on or about April 23, 2013, and on or about August 14, 2013, in the District of Alaska and elsewhere, the Defendant, JASON JAYAVARMAN, a United States citizen, did intentionally attempt to travel in foreign commerce for the purpose of

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engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with another person.

All of which is in violation of Title 18 U.S.C. §§ 2423(b) and (e).

A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

s/Audrey J. Renschen
AUDREY J. RENSCHEN
United States of America
Assistant U.S. Attorney

s/Ravi Sinha
RAVI SINHA
United States of America
Trial Attorney

s/Karen L. Loeffler
KAREN L. LOEFFLER
United States of America
United States Attorney

DATE: 8/22/2013